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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91210542
Party	Defendant TouchDome LLC
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

TISSOT S.A.,

Opposer,

v.

TOUCHDOME LLC,

Applicant.

Mark: TOUCHDOME

App. Serial No.: 85643792

Opposition No.: 91/210,542

ANSWER AND AFFIRMATIVE DEFENSES

Applicant TouchDome LLC (hereinafter "Applicant"), a limited liability company duly organized and existing under the laws of the Commonwealth of Virginia, having a place of business at 3900 Fairfax Drive #1902, Arlington, Virginia 22203, as and for its Answer to the Notice of Opposition of Opposer Tissot S.A. ("Opposer"), states as follows:

1. Applicant denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1 of the Notice of Opposition, and therefore denies the same.
2. Applicant denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2 of the Notice of Opposition, and therefore denies the same.
3. Applicant denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 of the Notice of Opposition, and therefore denies the same.
4. Applicant denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 4 of the Notice of Opposition, and therefore denies the same.

5. Paragraph 5 of the Notice of Opposition contains legal conclusions as to which no response is required.

6. Applicant denies the allegations of paragraph 6 of the Notice of Opposition.

7. Applicant admits the allegations of paragraph 7 of the Notice of Opposition, but denies that its mark is confusingly similar to Opposer's T TOUCH Trademark.

8. Applicant denies the allegations of paragraph 8 of the Notice of Opposition.

9. Applicant denies the allegations of paragraph 9 of the Notice of Opposition.

10. Applicant denies the allegations of paragraph 10 of the Notice of Opposition.

11. Applicant denies the allegations of paragraph 11 of the Notice of Opposition.

AFFIRMATIVE DEFENSES

First Affirmative Defense

The Notice of Opposition fails to state a claim for which relief may be granted.

Second Affirmative Defense

There is a lack of a likelihood of confusion between Opposer's mark and Applicant's mark.

WHEREFORE, Applicant respectfully requests that Opposer's Notice of Opposition be dismissed with prejudice, and that a Certificate of Registration be issued to Applicant.

Respectfully submitted,

Dated: June 17, 2013

By: /Lisa A. Ferrari/
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Attorneys for Applicant TouchDome LLC

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that on June 17, 2013, a copy of the foregoing **ANSWER AND AFFIRMATIVE DEFENSES** is being electronically filed with the United States Patent and Trademark Office, Trademark Trial And Appeal Board, at <http://estta.uspto.gov/>.

/Lisa A. Ferrari/

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2013, I caused a copy of the foregoing **ANSWER AND AFFIRMATIVE DEFENSES** to be served upon Opposer via First-Class U.S. Mail, postage prepaid, addressed as follows:

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/Lisa A. Ferrari/